

REMARKS/ARGUMENTS

Prior to entry of this amendment, claims 1-43 were pending in this application. Claims 1, 22, and 33 have been amended, no claims have been added and claims 3, 4, 23, 24, 34, and 35 have been canceled. Therefore, claims 1, 2, 5-22, 25-33, and 36-43 remain pending. Applicants respectfully request reconsideration of these claims, as amended, for at least the reasons presented below.

35 U.S.C. §102 Rejection, Madan

The Office Action has rejected claims 1-5, 8-15 and 17-43 under 35 U.S.C. § 102(e) as being anticipated by US Patent No. 6,748,374 of Madan et al. (hereinafter "Madan"). The Applicant respectfully submits the following arguments pointing out significant differences between claims -5, 8-15 and 17-43 submitted by the Applicant and Madan.

Madan "is directed to the storage and access of object-oriented entities within a relational database management system." (Col. 1, lines 13-15) More specifically, Madan "is directed to the representation and storage of directory information objects, such as LDAP directory data, in a relational database system" and "the generation of a database query language statement to query or manipulate directory information objects in a relational database." (Col. 4, lines 30-32 and 33-35) Madan discloses methods for defining, modifying, and deleting attribute types (Col. 13, line 16 - col. 14, line 38) and defining, modifying object classes (Col. 14, line 39 - col. 16, line 2). However, Madan explicitly states that "a superior class can not be removed." (Col. 15, lines 34-35)

Claim 1, upon which claims 2, and 5-21 depend, claim 22, upon which claims 25-32 depend, and claim 33, upon which claims 36-43 depend, each recite in part "removing a

subset of said first set of attributes from said entry after said step of creating said first entry wherein removing the subset of said first set of attributes comprises removing a first auxiliary class of one or more auxiliary classes associated with said subset of said first set of attributes and removing auxiliary classes that are superior to said first auxiliary class and that are not superior to any auxiliary classes that remain part of said entry." Madan does not disclose removing auxiliary classes that are superior to a first auxiliary class. Rather, Madan explicit states that "a superior class can not be removed." For at least these reasons, claims 1, 2, 5, 8-15 and 17-22, 25-33, and 36-43 should be allowed.

35 U.S.C. §103 Rejection, Madan in view of Desgranges

The Office Action rejected claims 6, 7 and 16 under 35 U.S.C. § 103(a) as being unpatentable over Madan in view of US Patent No. 6,751,797 of Desgranges (hereinafter "Desgranges"). The Applicant respectfully submits that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicant requests reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP §706.02(j).

As will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. The Office Action does not provide evidence that the suggestion or motivation to modify or combine the references cited is explicit or implicit in the references cited. Further, the Office Action does not provide any evidence that knowledge of

one skilled in the art would provide the suggestion or motivation to modify these references. Finally, the Office Action does not provide evidence of a reasonable expectation of success of such a modification or combination.

As discussed above, Madan does not teach or suggest removing auxiliary classes that are superior to a first auxiliary class. Rather, Madan explicit states that "a superior class can not be removed."

Desgranges is directed to "a method for managing the persistence of EJB [Enterprise Java Beans] components integrated into an EJB server of a computer system. (Col. 1, lines 45-47) The method "consists of managing persistence in a directory accessed via LDAP by mapping and adapting an entity EJB component to a given type of LDAP entry in a given directory." (Col. 1, lines 48-51) Desgranges discloses methods for creating, modifying and deleting these LDAP enties but does not teach or suggest removing auxiliary classes that are superior to a first auxiliary class.

Therefore, neither reference, alone or in combination, teaches or suggests removing auxiliary classes that are superior to a first auxiliary class. For at least these reasons, claims 6, 7 and 16 should be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this application are in condition for allowance and an action to that end is respectfully requested.

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PATENT

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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